

AO 91 (Rev. 11/11) Criminal Complaint

Felony

UNITED STATES DISTRICT COURT

for the
Southern District of TexasUnited States District Court
Southern District of Texas
FILED

DEC 23 2016

David A. Bradley, Clerk of Court

United States of America)

V.)

Michael Abel GARZA)

Defendant(s))

Case No.

B-16-mj-1224

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 22, 2016 in the county of Cameron in the Southern District of Texas, the defendant(s) violated:

Code Section

Title 31, United States Code, Section 5332

Offense Description

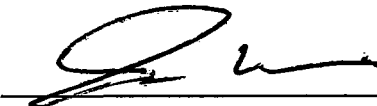
Intent to evade a currency reporting requirement by knowingly concealing more than \$10,000 in currency or monetary instruments totaling approximately \$59,915.00 in a conveyance, transported or transferred or attempted to transport or transfer such currency or monetary instruments totaling approximately \$59,915.00 from within the United States to a place outside the United States.

This criminal complaint is based on these facts:

On December 22, 2016, Michael Abel GARZA attempted to smuggle approximately \$59,915.00 in U.S. Currency from the United States into the Republic of Mexico via the Gateway International Port of Entry in Brownsville, Texas. GARZA was the sole driver and occupant of a 2005 Honda Accord bearing Texas License Plates [REDACTED]. Customs and Border Protection Officers (CBPOs) conducted an outbound inspection of the vehicle driven by GARZA. During this inspection, GARZA made a negative declaration to CBPOs. CBPOs referred GARZA to secondary inspection where a canine team was utilized, discovering twelve (12) packages wrapped in clear plastic and aluminum foil inside the vehicle. These packages were concealed in a natural void under the rear seat of the vehicle. The packages contained a total of \$59,915.00 in U.S. currency. Homeland Security Investigations Brownsville, Texas Special Agents arrived at the port of entry and were briefed on the facts of the case. During the interview, GARZA admitted he was going to be paid an undisclosed amount of money to smuggle an undetermined amount of merchandise into Mexico.



Continued on the attached sheet.



Complainant's Signature

Jesus Villarreal Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Dec 23 2016
Date

Brownsville, Texas

City and State



Judge's signature

Ronald G. Morgan U.S. Magistrate Judge

Printed name and title